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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case No.
Plaintiff,)
v.) STIPULATION AND [PROPOSED] ORDER
ROWLAND MARCUS ANDRADE,) REGARDING ADDENDUM TO EXISTING
Defendant.) PROTECTIVE ORDER
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It is hereby stipulated and agreed to by and between counsel for the United States and counsel for defendant Rowland Marcus Andrade (“Defendant”) that the parties hereby enter into the following

1 Addendum to the existing Protective Order, Dkt. #24. This Addendum applies only to the government's
2 production of the affidavit in support of the search warrant for the search and seizure of items from the
3 home of Maria Butina at 3617 38th Street, NW, Washington, D.C., 20016, on July 15, 2018 (the "Sealed
4 Butina Affidavit"). All discovery produced by the government to date, and all future discovery
5 produced moving forward, shall be governed by the existing Protective Order, which remains in full
6 force and effect.

7 **Rules for the Handling of the Sealed Butina Affidavit.**

- 8 a. **Limitations on Use.** Mr. Andrade and his legal team may use the Sealed Butina
9 Affidavit solely in connection with the defense of this case, including any post-
10 conviction or appellate litigation, or in "litigating related ancillary proceedings
11 (including civil forfeiture actions and actions brought by the Securities and Exchange
12 Commission, and any civil or criminal litigation concerning AML Bitcoin or to which
13 Rowland Marcus Andrade or NAC Foundation, LLC is a party or witness),"
14 ("ancillary cases") as permitted by the existing Protective Order governing discovery
15 in this case. Dkt #124 at 3. Any and all counsel who will see, use, or discuss the
16 contents of the Sealed Butina Affidavit must sign and comply with this Addendum
17 and be bound by its terms.
- 18 b. **Limitations on Dissemination.** Mr. Andrade, his legal defense team, and his
19 ancillary counsel (collectively, "authorized persons") shall not copy or reproduce the
20 Sealed Butina Affidavit except in order to provide copies of the document for use in
21 connection with this case or any of Mr. Andrade's ancillary proceedings. Copies and
22 reproductions, and any notes or records made in relation to the contents of the Sealed
23 Butina Affidavit, are to be treated in the same manner as the original document.
- 24 c. **Court Filings.** Absent prior agreement by the parties or permission from the Court,
25 no party shall disclose the Sealed Butina Affidavit in any public filing with the Court.
26 It shall be submitted under seal in accordance with Local Criminal Rule 49(f)(6). The
27 Clerk of Court shall accept for filing under seal any filings made in compliance with
28 that Rule and so marked by the parties pursuant to this Order.

d. **Court Hearings.** The restrictions in this Order shall not limit either party in the use of the Sealed Butina Affidavit in judicial proceedings in this case or Mr. Andrade's ancillary proceedings. The procedures for use of the Sealed Butina Affidavit during any hearing or the trial of this matter shall be determined by the parties and the Court in advance of the hearing or trial.

e. **Storage.** The Sealed Butina Affidavit must be maintained in the custody and control of Mr. Andrade, the legal defense team, or Mr. Andrade's ancillary counsel.

8 This stipulation is without prejudice to either party applying to the Court to modify the terms of
9 any protective order. This Court shall retain jurisdiction to modify this Order upon motion of either
10 party even after the conclusion of district court proceedings in this case.

IT IS SO STIPULATED.

ISMAIL J. RAMSEY
United States Attorney

Dated: August 25, 2023

/s/
CHRISTIAAN H. HIGHSMITH
Assistant United States Attorney

/s/
MICHAEL J. SHEPARD
KERRIE C. DENT
CINDY A. DIAMOND
Counsel for Defendant
ROWLAND MARCUS ANDRADE

[PROPOSED] ORDER

Pursuant to the foregoing stipulation of the parties and good cause having been shown, the Court hereby ORDERS that the foregoing stipulated Addendum to the Protective Order is in full force and effect.

IT IS SO ORDERED.

Dated: August ___, 2023

HON. LAUREL BEELER
United States District Court Magistrate Judge

By signing below, I acknowledge that I have been provided and have reviewed a copy of this Order and hereby agree to be bound by its terms: